

ANNEX 1 to DSGC letter of 19 February 2020

NOTE: THESE ARE THE PROPOSED DESIGN PRINCIPLES SUBMITTED BY DSGC IN MAY 2019 AS PART OF THE EXETER AIRPORT ACP STAGE 1 STEP 1B 'FORMULATION OF DESIGN PRINCIPLES'

ACP Design Principles

DSGC believes that from the viewpoint of aviation stakeholders, the principles which should guide any changes proposed to local airspace are set out in the appropriate legislative and industry guidance, as highlighted below. These principles should therefore guide the development and assessment of options.

1. **The statutory framework:** the established hierarchy of principles and priorities set out in the Transport Act 2000 Section 70, including footnotes 1 – 3. (See <https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Legislative-framework-to-airspace-change/>).
2. Compliance with all other statutory and CAA guidance on changes to and the modernisation of airspace, including and subject to the following provisions.
3. “The principle that the least restrictive categorisation of airspace should be the norm in UK airspace design, with more restrictive classifications only being established where necessary when the safety need is clearly demonstrated”. (Taken from SARG’s Policy Statement dated 14 August 2015 for Radio Mandatory Zones and Transponder Mandatory Zones, paragraph 1.2).
4. “Any airspace design is to use the minimum volume of CAS, consistent with safe and efficient air traffic operations”. (So as to comply with the relevant Airspace Modernisation Strategy Objective/parameter, see AMS page 23).
5. “Airspace developments at lower altitudes must...consider the need to safely integrate other airspace users within the airport vicinity, including General Aviation...” (AMS paragraph 4.24) with the related principle that “airspace modernisation should satisfy the requirements of operators and owners of all classes of aircraft across the commercial, General Aviation and military sectors”. (AMS paragraph 3.5).
6. **Additional Note:** DSGC feels that airspace structures in terms of zones and CTAs should not be overly complicated. This principle appears to have had backing from NATS during the 2017 ACP process. [“NATS raised concerns relating to the airspace design which was assessed as potentially complicating Air Traffic Management (ATM) arrangements in the area”: , quote from Consultations Report, Executive Summary: this was understood to relate to the number, size and varying bases of the CTAs].

Summary

The principles set out above enable a subsequent test to be applied to the preferred option which is proposed to form an ACP submission:

- (a) Has the safety need for any change from the status quo been clearly demonstrated? (So as to comply with the SARG principle referred above).
- (b) Do the proposals constitute the least restrictive categorisation of airspace required to meet the demonstrated need? (Ditto).
- (c) In the event of a demonstrable need for controlled airspace, has the change sponsor clearly demonstrated that its proposal will...“use the minimum volume of CAS, consistent with safe and efficient air traffic operations?” (So as to comply with the relevant AMS Objective/parameter, see AMS page 23).